

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---------------|---|--------------------------|
| In re: |) | Case No. 23-02510 |
| Pamela R Shaw |) | Chapter 13 |
| |) | Judge: Deborah L. Thorne |
| Debtor |) | |

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Pamela R Shaw
505 Racine Ln
Bolingbrook, IL 60440

DAVID FREYDIN LTD
8707 SKOKIE BLVD #305
SKOKIE, IL 60077

Please take notice that on July 20, 2023 at 10:30 am, a representative of this office shall appear before the Honorable Judge Deborah L. Thorne, or any judge sitting in that judge's place, either in Courtroom 682 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604 or electronically as described below and present the Trustee's motion a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government (audio only).

To appear by Zoom using the internet, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID.

Meeting ID. The meeting ID for this hearing is **160 9362 1728**. The meeting ID can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

I certify that this office caused a copy of this notice to be delivered to the above listed debtor by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on June 27, 2023.

801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

/s/ Gerald Mylander

FOR: Glenn Stearns, Chapter 13 Trustee

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MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtor filed a petition under Chapter 13 on Sunday, February 26, 2023.
2. The Debtor has failed to:
 - a. File amended schedule(s) E.
 - b. Propose a feasible plan that will complete within the maximum 60 month period.
 - c. File an amended plan.
3. As a result, the Debtor has failed to comply with the Bankruptcy Code and has caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350

Respectfully Submitted;

/s/ Gerald Mylander

FOR: Glenn Stearns, Chapter 13 Trustee